



Christopher H. Lowe

420 Lexington Avenue, Suite 1830
New York, New York 10170-1830

Main: 212.392.4772

Direct: 212.764.7171

Fax: 212.444.1030

chris@lipskylowe.com

www.lipskylowe.com

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VIA ECF

The Honorable J. Paul Oetken, U.S.D.J.
U.S. District Court for the Southern District of New York
40 Foley Square
New York, New York 10007

Re: Abdelaal v. The City of New York, et al., 1:20-cv-09716

Dear Judge Oetken:

This firm represents the Plaintiff. We write jointly with Defendants' counsel, and in accordance with Your Honor's Individual Rules and Practices, Rule 3(C), to respectfully request an extension of time to complete discovery, which is present set to close on July 19, 2021. This is the first request to extend this deadline.

The parties require additional time to complete discovery in order to determine if any additional paper discovery is needed or if there are any deficiencies in the respective parties' written discovery. Further, the parties agreed to participate in mediation prior to conducting depositions to determine if they could resolve this matter before incurring deposition costs. They, however, are currently in the process of rescheduling their mediation session – which was previously scheduled for July 13 – because the mediator is no longer available on that day. Finally, the parties require additional time to complete discovery in order to accommodate their respective counsel's planned summer vacations.

Accordingly, we respectfully request that discovery be extended to October 19, 2021. If granted, we further respectfully request that the July 26 telephone conference be adjourned to a date and time after the new discovery deadline.

Respectfully Submitted,
LIPSKY LOWE LLP

s/ Christopher H. Lowe
Christopher H. Lowe

cc: William Grey, Esq. (via ECF)